

EXHIBIT 2

to

DEFENDANT BUILD OUR CENTER'S MOTION FOR LIMITED PROTECTIVE ORDER TO STAY DISCOVERY AS TO BUILD OUR CENTER

In

Ribar vs. Washoe County, et alia
(Case No. 3:24-cv-00526)

Declaration of Alison R. Kertis, Esq.

EXHIBIT 2

DECLARATION OF ALISON KERTIS

I, ALISON KERTIS, state under penalty of perjury as follows:

1. I am over the age of twenty-one (21) years and competent to testify regarding the matters asserted herein which are based upon my own personal knowledge (save and except for any stated upon information, but as to such matters I believe each to be true).

2. I am an attorney employed by the Sierra Crest Business Law Group and duly licensed and admitted to practice law in Nevada.

3. In that capacity, I represent Build Our Center, Inc., a named defendant in that certain matter currently pending before the Second Judicial District Court of the State of Nevada in and for the County of Washoe which is entitled *Ribar vs. Washoe County, et alia* and has been assigned Case No. 3:24-cv-00526 (the “Proceeding”).

4. This testimony is made for and in support of *Defendant Build Our Center’s Motion for Limited Protective Order to Stay Discovery as to Build Our Center* (the “Motion”) filed in the Proceeding concurrent herewith.

5. Build Our Center does not have financial resources to litigate a lawsuit, much less to defend itself against an onslaught of motions and respond to excessive discovery that will, most certainly, be filed/propounded by Drew Ribar, the Plaintiff in the Proceeding.

6. Thus, I am representing Build Our Center on a pro-bono basis and my staff is performing services at a reduced rate.

7. Even with a reduced rate/pro-bono representation, I believe that Build Our Center's resources for attorneys' time and costs cannot compete with the onslaught of very likely heavy motion practice and excessive discovery that will be lodged by Mr. Ribar, especially when he has failed to articulate any claims for relief relating to Build Our Center.

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1 **8.** I attended a Meet-and-Confer with Mr. Ribar (via Zoom) on January 9,
2 2025, but we were unable to come to agreement on a limited stay of discovery.

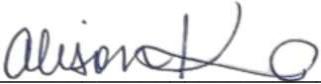
3 **9.** My own time and resources are not unlimited.

4 **10.** I have read the Motion, am familiar with its contents, and can state
5 that, based upon my personal knowledge, all factual matters set forth therein
6 are true, save and except for any stated upon information (but as to such matters
7 I believe each to be true).

8 **11.** If I were to give testimony in open court concerning any statement
9 contained in this affidavit, it would be substantively the same as that set forth
10 above.

11 **I declare under penalty of perjury under the laws of the United
12 States of America that the foregoing is true and correct.**

13 Executed on January, 2025.

14 
15 Alison R. Kertis, Esq. (SBN 13875)